

STATE OF OKLAHOMA)
) ss
COUNTY OF OKLAHOMA)

AFFIDAVIT OF TIFFANY CARTER

I, Tiffany Carter, being first duly sworn, hereby affirm and state as follows:

1. In December of 2020 and January of 2021, I was employed at the Oklahoma County Detention Center ("OCDC") and held the rank of captain. I started working at the jail in 2007 as a clerical person. I became CLEET certified in 2015 and worked my way up to the rank of Captain.

2. As Captain, I supervised and was responsible for the detention officers on the cell floors (which included floors two through thirteen), medical security, special services, and security escort.

3. There was no minimum staffing number for each floor. Ideally, a normal floor would have two roving officers and four pod officers.

4. The OCDC lost many staff members when the Oklahoma County Sheriff transferred operational control of the OCDC to the Oklahoma County Criminal Justice Authority ("OCCJA").

5. Staff retention was the greatest obstacle to staffing problems at the OCDC. The OCCJA held academies for officers, but it was not easy to retain staff.

6. On September 16, 2020, the jail administrators, Greg Williams and William Monday, asked me what I needed to run the jail. My biggest concern was staffing. In response, both Mr. Williams and Mr. Monday continued to try to hire more staff.

7. The COVID -19 pandemic played a significant role in the staffing issues.

8. On January 2, 2021, I received a call from Greg Williams about the death of Brad Lane. I learned that Lane's death was a homicide, and that someone tried to call medical, but no one answered.

9. Based upon my fourteen years of training and experience working at the OCDC, Lane's death was not caused by a staffing issue. It was a spontaneous and series incident that was not predictable.

FURTHER AFFIANT SAYETH NOT.


Tiffany Carter

Subscribed and sworn to before me this 27th day of June, 2024.


Notary Public

